

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Civil Action No. 04-12135-NG

ROBERT WADE,  
Petitioner

v.

BERNARD F. BRADY, Acting Superintendent, and  
THOMAS F. REILLY, Attorney General,  
Respondents

**Affidavit of Counsel**

I, Janet H. Pumphrey, hereby state and depose:

1. I am requesting an enlargement of time to file the Plaintiff's Response which the Court has requested on the basis of the following case load and personal circumstances.
2. I will be away from March 15 to March 21 on a long-planned trip to Texas. I got married in June of last year, and my husband and I postponed our wedding celebration until this March so that our friends and family could join us in Texas for this event.
3. I have the following civil cases pending in the Appeals Court: Foley v. Morris (reply brief due on March 27); Town of Lee v. Touponce (awaiting audio tapes from Housing Court).
4. In the Supreme Judicial Court, I have the following first degree murder cases pending: Commonwealth v. Colon (brief due on April 4, 2006); Commonwealth v. Molina (stayed pending Motion for a New Trial to be filed in the Superior Court),

Commonwealth v. Colleran (stayed in the Supreme Judicial Court, awaiting Superior Court decision after evidentiary hearing on Defendant's Motion for a New Trial), Commonwealth v. Robidoux (stayed in the Supreme Judicial Court, awaiting transcripts from hearing on Defendant's Motion for a New Trial in the Superior Court), Commonwealth v. Haith (awaiting trial transcripts); Commonwealth v. Smith (awaiting trial transcripts); Commonwealth v. Halliday (awaiting Commonwealth's brief), and Commonwealth v. Druce (awaiting trial transcripts).

5. In the Appeals Court, I have the following criminal cases pending: Commonwealth v. Miller (awaiting transcripts), and Commonwealth v. Becker (awaiting trial transcripts).
6. I have the following case in Hampden Superior Court: Commonwealth v. Tash (preparing Motion for New Trial).

Signed under pains and penalties of perjury,



Janet H. Pumphrey